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 Services, Inc., Angeles Chemical Company,
 Inc., and John Locke

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANGELES CHEMICAL COMPANY, INC., et al.)	Northern District Miscellaneous Matter No.
)	Case No. C 06-80343 Misc MMC (EDL)
)	Case No. C 07-80123 Misc MMC (EDL)
Plaintiffs,)	
)	Case No: 01-10532 TJH (Ex)
vs.)	Central District of California
)	
MCKESSON CORPORATION, a California Corporation, MCKESSON CHEMICAL COMPANY, FOREMOST-MCKESSON EXPORT CORPORATION, MORELAND- MCKESSON CHEMICAL COMPANY INC., and DOES 1 through 500, Inclusive,)	SUPPLEMENTAL DECLARATION OF JEFFERY L. CAUFIELD IN SUPPORT OF ANGELES' REPLY TO SQUIRE SANDERS & DEMPSEY'S OPPOSITION TO ANGELES' MOTION TO COMPEL SQUIRE SANDERS & DEMPSEY'S COMPLIANCE WITH THE MARCH 22, 2007 COURT ORDER
Defendants.)	
)	Date: June 6, 2007
)	Time: 9:00 a.m.
)	Room: Courtroom E, 15 th Floor
)	450 Golden Gate Ave
)	San Francisco, CA
)	Judge: Hon. Elizabeth D. Laporte

I, Jeffery L. Caufield, declare as follows:

- I am an attorney of record for Plaintiffs and Counter-Defendants, Greve Financial Services, Inc., a California corporation, Angeles Chemical Company, Inc., a California corporation, Janyce Locke, an individual, and John Locke, an individual (collectively, "Angeles") in the above entitled action. (All definitions used in this Declaration not otherwise set forth herein, shall have those definitions as set forth in ANGELES' MOTION TO COMPEL SQUIRE SANDERS & DEMPSEY'S COMPLIANCE WITH THE MARCH 22, 2007 COURT ORDER).

2. Angeles has sent and/or received over 13 letters and e-mails since the March 22, 2007 Order was issued, not including the parties' discussions over the phone or SSD's proposal to "compromise" sent on April 24, 2007 and Angeles reply.
3. SSD was to comply with the March 22 Order on or before April 5, 2007. See also Exhibit A to Caufield Dec. at p. 3, ln.1-5.
4. SSD received additional correspondence in the Notice of Errata and thus could address other issues in SSD's opposition.
5. Attached hereto as **Exhibit BB** is a true and correct copy of a letter dated April 24, 2007, from Ms. Gibson to Mr. Caufield regarding SSD's document production.
6. Attached hereto as **Exhibit CC** is a true and correct copy of an email dated April 24, 2007, from Mr. Caufield to Ms. Gibson regarding Ms. Gibson's April 24 letter.
7. Attached hereto as **Exhibit DD** is a true and correct copy of an email dated March 9, 2007, from Mr. Caufield to Ms. Gibson regarding the stipulated order.
8. Attached hereto as **Exhibit EE** is a true and correct copy of an email dated March 15, 2007, from Mr. Caufield to Ms. Gibson regarding Ms. Gibson's March 13 letter.
9. Attached hereto as **Exhibit FF** is a true and correct copy of an email dated March 15, 2007, from Ms. Gibson to Mr. Caufield regarding the stipulated order.
10. Attached hereto as **Exhibit GG** is a true and correct copy of a letter dated March 28, 2007, from Ms. Gibson to Mr. Caufield regarding the Court's March 22 Order.
11. Attached hereto as **Exhibit HH** is a true and correct copy of an email dated March 29, 2007, from Mr. Caufield to Ms. Gibson regarding Ms. Gibson's March 28 letter.
12. Attached hereto as **Exhibit II** is a true and correct copy of an email dated April 10, 2007, from Ms. Gibson to Mr. Caufield regarding the SSD production.
13. Attached hereto as **Exhibit JJ** is a true and correct copy of a letter dated April 16, 2007, from Ms. Gibson to Mr. Caufield regarding SSD's Revised Privilege Log, attached thereto.
14. Attached hereto as **Exhibit KK** is a true and correct copy of an email dated April 19, 2007, from Mr. Caufield to Ms. Gibson regarding SSD's request for extension of time.
15. See **Exhibit BB** at p. 2, ¶ 3.
16. See **Exhibit BB** at p. 2, ¶ 5.
17. Attached hereto as **Exhibit LL** is a true and correct copy of an email dated October 13,

2006, from Mr. Joe Rossettie of Caufield & James to Ms. Henderson regarding correspondence between McKesson and Graham & James regarding the sale of McKesson Chemical in the mid-1980's, including correspondence attached hereto.

18. Attached hereto as **Exhibit MM** is a true and correct copy of a string of correspondence, including: a true and correct copy of a letter from Dinah Szander to Yvonne Quint dated December 20, 1993; a true and correct copy of a letter from Dinah Szander to Joel Summer dated November 22, 1995; a true and correct copy of a letter from Paula Harris to Dinah Szander dated July 23, 1996; a true and correct copy of a letter from Paula Harris to Ivan Meyerson dated September 9, 1996; a true and correct copy of a letter from Dinah Szander to Paula Harris dated September 27, 1996; a true and correct copy of a letter from Paula Harris to Dinah Szander dated October 9, 1996; a true and correct copy of a letter from Dinah Szander to Paula Harris dated October 14, 1996; a true and correct copy of a letter from Paula Harris to Carole Ungvarsky dated October 18, 1996; a true and correct copy of a letter from Paula Harris to Dinah Szander dated October 29, 1996; a true and correct copy of a letter from Dinah Szander to Paula Harris and Joel Summer dated November 5, 1996; a true and correct copy of a letter from Paula Harris to Carole Ungvarsky dated December 17, 1996; a true and correct copy of a letter from Paula Harris to Dinah Szander dated August 22, 1997; and a true and correct copy of a letter from Paula Harris to Carole Ungvarsky dated March 3, 1997.

19. Attached hereto as **Exhibit NN** is a true and correct copy of a letter dated July 30, 2003 letter from Univar to Jeffery Caufield. See p. 65, ¶ 2.

20. Attached hereto as **Exhibit OO** are McKesson Confidentiality Agreements, including: a true and correct copy of the February 27, 1986 Confidentiality Agreement, Bates Nos. MCK0059246-MCK0059247 (See p. 1, ¶¶ 3, 7.); a true and correct copy of the October 31, 1986 Confidentiality Agreement, Bates No. MCK0059528 (See p. 4.)

21. Attached hereto as **Exhibit PP** is a true and correct copy of a letter dated September 9, 1986, from Ivan Meyerson to Mr. Unkovic of Graham & James, Bates Nos. MCK0065260-MCK0065263. See p. 3, ¶ (f).

22. Neither McKesson nor Univar disclosed to Angeles that certain employees, including in-house attorneys, were involved in the transmittal of documents, until years after litigation ensued.

1 23. SSD failed to produce the correspondence that McKesson sent to SSD and vice versa.

2 I declare under penalty of perjury that the foregoing is true and correct. Executed in San
3 Diego, California on May 29, 2007.

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JEFFERY L. CAUFIELD
Attorneys for Plaintiff/Counter-Defendant